

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Regina M. Dreher	:	CHAPTER 13
	:	
Debtors.	:	18-03124-RNO
PennyMac Loan Services, LLC	:	
	:	
Movant,	:	
	:	
v.	:	11 U.S.C. §362
	:	
Regina M. Dreher and	:	
Charles J. DeHart, III	:	
	:	
Respondents	:	

ANSWER TO MOVANT’S MOTION FOR RELIEF

AND NOW, comes the Debtor, Regina Dreher, by and through her Attorney, Patrick J. Best, of ARM Lawyers, who hereby answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. It is specifically denied that any assignment of mortgage is proper.
5. Admitted.
6. Admitted in part and denied in part. Debtor has entered into a mortgage modification agreement. By virtue of this agreement, Debtor’s account is current.
7. Denied. Debtor has entered into a mortgage modification agreement. By virtue of this agreement, Debtor’s account is current.
8. Denied. Debtor has entered into a mortgage modification agreement. By virtue of this agreement, Debtor’s account is current.

9. Denied. First, Debtor has entered into a mortgage modification agreement. By virtue of this agreement, Debtor's account is current. Second, any and all attorney's fees for bankruptcy related legal services would be prohibited by Act 6.

10. This is a conclusion of law to which no response is required.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief.

Date: June 10, 2019

/s/ Patrick J. Best
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